## **EXHIBIT B**

## **Cathy Dittrich**

From:

Cathy Dittrich [cathy.dittrich@traverselegal.com]

Sent:

Monday, January 04, 2010 9:54 AM

To:

'wdelgado@willenken.com.readnotify.com'

Cc:

'Enrico Schaefer'

Subject:

Weather Underground v. Navigation Catalyst Systems

Attachments: 01-04-10 ltr to Delgado.pdf

Please see attached.

Cathy Dittrich
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ATTORNEYS & ADVISORS

January 4, 2010

VIA EMAIL ONLY

William A. Delgado Willenken Wilson Loh & Lieb LLP 707 Wilshire Boulevard, Suite 3850 Los Angeles, CA 90017

Re: Weather Underground v. Navigation Catalyst Systems, et.al.

Dear Will:

I received your email over the holiday weekend. I believe the Court Rules require us to discuss "specifically" issues related to the length of discovery. I do not recall you raising any specific issues in our telephone conference on December 15, 2009, concerning length of discovery. My concern is that your client's goal is merely to delay the matter as much as possible. Please provide specific information as to why you believe it will take so long to complete discovery. My client's trademarks are probably not an issue, as they are incontestable at this point. Your client's registration of the domain names at issue is not in contest. It appears this matter is fairly straightforward in terms of your defense, which will rely almost exclusively on information within your control.

On a side note, we did speak with the Court Clerk, who indicated we should commence discovery immediately. Therefore, the discovery period has in fact started. Regardless, the dates would begin running from the entry of the Court's Order.

I look forward to your response. If you would like to call me directly to discuss any specific discovery issues you have now identified, feel free to do so.

Sincerely,

TRAVERSE LEGAL, PLC

Enrico Schaefer

enrico@traverselegal.com

ES/cad